

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

WENDY C. DINKINS

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CRIMINAL NO. 04-10039-PBS

JOINT MEMORANDUM FOR INITIAL STATUS CONFERENCE

The parties submit this joint memorandum addressing the issues set out in Local Rule 116.5(A).

(1) Relief from Rule 116.3 – Discovery Motion Practice:

The parties do not request relief from the schedule set out in Local Rule 116.3.

(2) Expert witness discovery:

The government does not anticipate offering expert witness testimony in this case.

(3) Additional discovery:

The government has produced the automatic discovery required under the Local Rules along with additional material in the hope that the defendant will more quickly be able to decide whether to enter a guilty plea. Defense counsel will need more time to review this material.

(4) Motion date:

The parties agree that it is premature, at this point, to set a schedule for other motions, because the defendant does not yet know what, if any, motions she will need to file.

FILED
In Open Court
USDC, Mass.
Date 4-15-04
By [Signature]
Deputy Clerk

(5) Excludable delay:

The parties are filing a motion and proposed order, asking the Court to exclude, under Local Rule 112.2(A)(2), the 28 days from the arraignment, March 1, 2004, through March 28, 2004. The motion also asks the Court to exclude, under 18 U.S.C. § 3161(h)(8)(A), the time from March 28, 2004 through the interim status conference.

(6) Trial likelihood and length:

If there is a trial, it will likely last approximately one week.

(7) Final/interim status conference:

The parties ask the Court to schedule an interim status conference in June, 2004.

Respectfully submitted,

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Dated: April 13, 2004